

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MICHAEL C. WORSHAM,

Plaintiff,

v.

DISCOUNT POWER, INC.,

Defendant.

Case No. 1:20-CV-00008-RDB

DEFENDANT’S MOTION FOR EXTENSION OF TIME

Pursuant to D. Md. Local Civ. R. 105(9), Defendant Discount Power, Inc. (“DPI”) respectfully moves for an extension of time of thirty (30) days after this Court’s ruling on Defendant’s Motion to Dismiss the Amended Complaint (Doc. No. 64), within which to respond to Plaintiff’s Partial Motion for Summary Judgment (Doc. No. 67). In support of this Motion, Defendants state:

1. Plaintiff Michael Worsham filed an Amended Complaint on May 13, 2021, re-alleging all seventeen (17) counts that the Court dismissed previously. (Doc. No. 54.)
2. On June 10, 2021, DPI filed a Motion to Dismiss the Amended Complaint in its entirety. (Doc. No. 64.)
3. On June 13, 2021, Plaintiff filed a Partial Motion for Summary Judgment. (Doc. No. 67.)
The response is due by June 28, 2021.
4. DPI expended significant time, money, and other resources in connection with its Motion to Dismiss the Amended Complaint, as well as the copious amount of briefing that took place prior to the dismissal of the original Complaint. DPI should not now be burdened with responding to Plaintiff’s Partial Motion for Summary Judgment given its pending

Motion to Dismiss, which should dismiss this case in its entirety. Granting this brief extension will not prejudice Plaintiff and will save both the Court and DPI significant resources. Therefore, good cause exists to grant this Motion.

5. Undersigned counsel attempted to contact Plaintiff to ascertain his position on this requested extension and his voicemail was full. Undersigned also sent an email to ascertain Plaintiff's position, but were unable to ascertain his position.

WHEREFORE, the Defendant Discount Power, Inc. respectfully request that the Court grant this Motion for an Extension of Time until thirty (30) days after this Court's ruling on Defendant's Motion to Dismiss (Dkt. No. 64), within which to answer Plaintiff's Partial Motion for Summary Judgment (Dkt. No. 67).

Dated: June 18, 2021

Respectfully submitted,

DEFENDANT,
DISCOUNT POWER, INC.

/s/ Brian A. Scotti
Thomas C. Blatchley (*Pro Hac Vice*)
Gordon & Rees LLP
95 Glastonbury Boulevard, Suite 206
Glastonbury, CT 06033
Phone: (860) 494-7525
Email: tblatchley@grsm.com

Brian A. Scotti (Bar # 18249)
Gordon & Rees LLP
1101 King St., Suite 520
Alexandria, VA 22314
Phone: (202) 399-1009
Fax: (202) 800-2999
Email: bscott@grsm.com

Counsel for Discount Power, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2021, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this document through the court's CM/ECF System.

/s/ *Brian A. Scotti*
Brian A. Scotti